



MEMO ENDORSED

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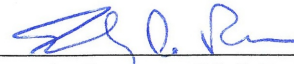
April 6, 2022

VIA ECF

Honorable Edgardo Ramos, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Courtroom 619
New York, New York 10007

The application for leave to file under seal is granted.

SO ORDERED.


Edgardo Ramos, U.S.D.J.
Dated: 04/06/2022
New York, New York

RE: *Wexler, et al. v. Allegion (UK) Limited, et al., No.: 1:16-cv-02252 (ER)*
Schlage Lock Company LLC v. Wexler, et al., No.: 1:18-cv-04033 (ER)

Dear Judge Ramos:

We represent Schlage Lock Company LLC (“Schlage”) in the above-referenced actions. On April 6, 2022, Schlage filed a Motion for Sanctions against the Wexler Parties. However, certain documents attached as exhibits to the Motion have been marked as “Confidential” or “Attorneys Eyes Only” by the Wexler Parties. Accordingly, pursuant to the S.D.N.Y. Local Rules and the S.D.N.Y ECF Rules and Instructions, Schlage writes to respectfully request permission to file the following documents under seal (which have not yet been filed):

1. Certification of Thomas Rattay, Esq.; and
2. Certification of Jon Kessler.

Schlage will file these documents under seal on ECF with the viewing level of “Selected Parties” and then upload a redacted copy to ECF as well. Schlage will also provide the Court, and opposing counsel, with a courtesy copy of the un-redacted motion papers. Although Schlage does not believe any of the documents marked as “Confidential” or “Attorneys Eyes Only” by the Wexler Parties warrant confidential treatment, we are filing this request pursuant to the terms of the Protective Order in this matter and to allow the Wexler Parties to explain why the documents they marked as confidential should remain under seal.¹

¹ Schlage served a third party subpoena to GoDaddy, a provider of email services. GoDaddy’s response, which is attached to the Kessler Certification, was marked as confidential. GoDaddy advises that the documents they marked as confidential “contain confidential, proprietary, trade secret, and/or private information that warrants special protection from public disclosure” and as such, requests that their documents be filed under seal. See <https://www.godaddy.com/legal/agreements/subpoena-policy>.

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Thank you for Your Honor's consideration of this letter.

Respectfully submitted,

**OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.**

Attorneys for Schlage Lock Company, LLC

/s Robin Koshy

cc: All counsel of record (via ECF)